

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

ERNESTINA GARCIA

VS

C.A. NO.: 13-617

HSBC BANK USA, NATIONAL  
ASSOCIATION, AS TRUSTEE  
FOR HOME EQUITY LOAN  
TRUST SERIES ACE 2006-HE1, ALIAS,  
HSBC BANK USA, NATIONAL  
ASSOCIATION, AS TRUSTEE  
FOR ACE SECURITIES CORP. HOME  
EQUITY LOAN TRUST, SERIES 2006-HE1, ASSET BACKED PASS-  
THROUGH CERTIFICATES, ALIAS  
WELLS FARGO BANK, N.A., ALIAS  
AND JOHN DOE

MOTION TO FILE AMENDED COMPLAINT

Plaintiff, by her Attorney, moves, pursuant to FRCP 15, that this  
Court allow her to file a Second Amended Complaint in the form attached.

August 13, 2014

ERNESTINA GARCIA

By her Attorney

/s/ John B. Ennis

JOHN B. ENNIS, ESQ. #2135  
1200 Reservoir Avenue  
Cranston, Rhode Island 02920  
401-943-9230

CERTIFICATION

I hereby certify that I emailed a copy of the above Motion to File an Amended Complaint to the following electronically on this 13<sup>th</sup> day of August, 2014.

Lauren J. Regis  
Seyfarth Shaw, LLP  
World Trade Center East  
Boston, MA 02210-2028

/s/ John B. Ennis